



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

AUG 17 1999

Mr. Stephen Cipit, Project Manager
Southern New Jersey Remediation Section
USEPA Region 2
290 Broadway
New York, NY 10007-1866

Dear Mr. Cipit:

Re: L.E. Carpenter Superfund Site
Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) is in receipt of your letter dated August 12, 1999 regarding the July 1999 Quarterly Monitoring Report for the L.E. Carpenter Superfund Site. Based on these comments, it appears that you did not review Bruce Venner's June 2, 1999 response to Carole Petersen's May 20, 1999 letter, since some issues you raised were addressed in that correspondence. For your convenience, another copy of that letter is enclosed. In addition, it appears that you did not review the July 1998 sample results from the ditch located on the Air Products, Inc. property. For your convenience, a copy of that data is enclosed. Presented below are specific responses to your comments.

The second paragraph of your letter requests that a focused feasibility study be conducted for the LNAPL since "it has become clear that EFR cleanup will continue for many years." As stated in Mr. Venner's June 2, 1999 letter, the Department assumes that EPA will conduct the necessary studies needed to change the remedy for free product recovery. The Department will allow EPA to conduct treatability studies, pilot tests, and a focused feasibility study for the free product recovery. However, since free product is actively being removed in accordance with the ROD, there is no justification for EPA to request that a focused feasibility study be conducted by the PRP.

The third paragraph of your letter states that low flow sampling methods should be employed for all future sampling of monitoring wells. It is the Department's understanding that low flow sampling is not a requirement, but rather an option. While it may give more accurate results, the purpose of the quarterly monitoring is to determine if the ground water contamination has moved or has increased. It is unnecessary to change sampling methods at this point in the project since it will not provide any additional information. When the ground water treatment system is operational, using the low flow method to determine compliance with ground water standards may be useful.

The fourth paragraph of your letter states that "EPA previously commented that a decent effort should be made to estimate remaining product volume" and that a "number of



reasonable tests could be applied to the data in order to evaluate the statistical certainty of a trend." As stated in Mr. Venner's June 2, 1999 letter, in August 1995 the amount of free product remaining was estimated. Currently, the PRP is estimating the current amount remaining. As for evaluating the statistical certainty of a trend, please provide the Department with a list of what "reasonable tests" could be applied to the data, and the PRP will be requested to do that.

The fifth paragraph of your letter states that MW-11D should be analyzed for VOCs, not just DEHP. This well was sampled once previously and DEHP was the only contaminant of concern that was detected. However, to satisfy EPA's concerns, the PRP will be requested to analyze this well for the parameters required by the sampling program.

The sixth paragraph of your letter states that the drainage channel adjacent to the site should be resampled. This was conducted in July 1998, and the results showed there were no site related impacts. Enclosed are the results of that sampling effort.

Please contact me at (609) 633-7261 if you have any questions.

Sincerely,

A handwritten signature in cursive script, reading "Gwen B. Zervas".

Gwen B. Zervas, P.E.
Case Manager
Bureau of Case Management